
From: Wells, Erika (ENRD) <Erika.Wells@usdoj.gov>
Sent: Monday, June 22, 2020 10:09 AM
To: Leefers, Kristin
Subject: RE: SRC settlement discussion
Attachments: 53759344-v1-Settlement Agreement - SRC Response Draft - 6.17.2020_EPA DOJ (6-22).docx

Thanks Kris, (b)(5) attorney-client
[Redacted]
[Redacted]

Thanks,
Erika

Erika M. Wells
U.S. Department of Justice
Environment & Natural Resources Division
Environmental Enforcement Section
c/o NOAA, Damage Assessment
7600 Sand Point Way, N.E.
Seattle, Washington 98115
Telephone: (206) 526-6608
erika.wells@usdoj.gov

From: Leefers, Kristin <Leefers.Kristin@epa.gov>
Sent: Friday, June 19, 2020 2:38 PM
To: Wells, Erika (ENRD) <EWells@ENRD.USDOJ.GOV>
Subject: RE: SRC settlement discussion

Hi Erika,

(b)(5) attorney-client
[Redacted]

Let me know what you think and we can get this back to Ken.

Kris




Kris Leefers
206-553-1532

From: Leefers, Kristin
Sent: Friday, June 19, 2020 2:07 PM
To: Wells, Erika (ENRD) <Erika.Wells@usdoj.gov>
Subject: RE: SRC settlement discussion

Hi Erika,

Here are my thoughts on the few remaining items:

(b)(5) attorney-client



Have a great weekend!

Kris

Kris Leefers
206-553-1532

From: Wells, Erika (ENRD) <Erika.Wells@usdoj.gov>



Sent: Thursday, June 18, 2020 1:28 PM

To: Leefers, Kristin <Leefers.Kristin@epa.gov>

Subject: RE: SRC settlement discussion

Kris,

(b)(5) attorney-client



Thanks,
Erika

Erika M. Wells
U.S. Department of Justice
Environment & Natural Resources Division
Environmental Enforcement Section
c/o NOAA, Damage Assessment
7600 Sand Point Way, N.E.
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erika.wells@usdoj.gov

From: Leefers, Kristin <Leefers.Kristin@epa.gov>
Sent: Thursday, June 18, 2020 12:46 PM
To: Ken Lederman <ken.lederman@foster.com>
Cc: Wells, Erika (ENRD) <EWells@ENRD.USDOJ.GOV>
Subject: RE: SRC settlement discussion

Thanks Ken. We'll review this and get back to you. We'll be standing by to review the Appendix D draft once you have that ready.

Kris

Kris Leefers
Assistant Regional Counsel
Deputy Unit Dive Officer
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 155
M/S: 11-C07
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leefers.kristin@epa.gov

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From: Ken Lederman <ken.lederman@foster.com>
Sent: Wednesday, June 17, 2020 3:06 PM
To: Leefers, Kristin <Leefers.Kristin@epa.gov>
Cc: Wells, Erika (ENRD) <Erika.Wells@usdoj.gov>; Ken Lederman <ken.lederman@foster.com>
Subject: RE: SRC settlement discussion

Kris – attached is an updated redline. All of your prior changes were accepted, but I changed the language on the stormwater easement to reflect revocation within a reasonable timeframe after written notification. If we were required to revoke in 30 days and if an alternative stormwater management system had not been provided, the resulting consequences could be dire. We want to provide some flexibility on the timing so that SRC is not damaged as a result.

On Appendix D, a title report has been requested and we will craft that list of permitted encumbrances separately.

Thanks.

Ken Lederman
Principal

Foster Garvey PC
Direct: 206.447.6267
Cell: 206.595.0680
ken.lederman@foster.com

From: Leefers, Kristin [<mailto:Leefers.Kristin@epa.gov>]
Sent: Thursday, June 11, 2020 2:42 PM

To: Ken Lederman
Cc: Wells, Erika (ENRD)
Subject: RE: SRC settlement discussion

Hi Ken,

As mentioned, here is the updated draft settlement for your review in advance of our call on Monday.

Take care,
Kris

Kris Leefers
Assistant Regional Counsel
Deputy Unit Dive Officer
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From: Leefers, Kristin
Sent: Thursday, June 11, 2020 8:30 AM
To: Ken Lederman <ken.lederman@foster.com>
Cc: Wells, Erika (ENRD) <Erika.Wells@usdoj.gov>
Subject: RE: SRC settlement discussion

Thanks Ken, we'll talk to you on Monday.

Kris Leefers
206-553-1532

From: Ken Lederman <ken.lederman@foster.com>
Sent: Thursday, June 11, 2020 8:16 AM
To: Leefers, Kristin <Leefers.Kristin@epa.gov>
Cc: Wells, Erika (ENRD) <Erika.Wells@usdoj.gov>
Subject: RE: SRC settlement discussion

Thanks Kris. I just sent an invite for a call at 1:00 pm on Monday.

Ken Lederman
Principal

Foster Garvey PC
Direct: 206.447.6267
Cell: 206.595.0680
ken.lederman@foster.com

From: Leefers, Kristin [<mailto:Leefers.Kristin@epa.gov>]
Sent: Thursday, June 11, 2020 8:04 AM
To: Ken Lederman
Cc: Wells, Erika (ENRD)
Subject: SRC settlement discussion

Hi Ken,

Erika and I would like to talk with you about the few remaining items in the SRC settlement. 30 minutes should be sufficient. We are available at the following times:

Monday 6/15: 9am-3pm (1-3pm is preferred)

Tuesday 6/16: 11am-12:30pm, 2:30-4:30pm

We are also working on an updated draft to address the matters raised when we spoke earlier this week. I should be able to send that to you later today or Friday.

Take care,
Kris

Kris Leefers
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Deputy Unit Dive Officer
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